

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

BRUCE PETRICCA )  
                    )  
                    )  
PLAINTIFF     )     CASE NO. 9:23-cv-81581-XXXX  
                    )  
                    )  
VS.                )  
                    )  
SAXONY CONDOMINIUM     )  
ASSOCIATION, INC., TODD HOOPER,     )  
CARMINE COLELLA, BARBARA     )  
FLANICK AND ALICE ZAZZMAN,     )

DEFENDANTS.

**Joint Notice of Liability**

COMES NOW Plaintiff, and files this notice Joint Liability between Todd Hooper and the Defendants for multiple Counts.

1. Count I is against all Defendants for discriminated against Plaintiff in the terms, conditions, or privileges of sale or rental of a dwelling, and more specifically in the provision of services or facilities in connection therewith, because of, sex. Specifically they interfered with the provision of services, and facilities to Mr. Petricca, and interfered in the ownership rights of Mr. Petricca, and the enjoyment of his home and common ownership of community facilities.
2. Count II is against against Defendants Todd Hooper, Alice Zazzman, Carmine Colella, and Saxony and involve defamatory remarks such as sex offender" and "pedophile".

3. Count III is against all Defendants and involve defamatory remarks such as sex offender" and "pedophile".
4. Count V Defendant Association and All Defendants coerced, intimidated, threatened and interfered with Plaintiff Bruce Petricca in the exercise and enjoyment of his rights as a purchaser under 42 U.S.C 3604, and interfered in his use and enjoyment of the facilities, and terms and Defendant Association and All Defendants coerced, intimidated, threatened and interfered with Plaintiff Bruce Petricca in the exercise and enjoyment of his rights as a purchaser under 42 U.S.C 3604, and interfered in his use and enjoyment of the facilities, and terms and privileges of ownership based on his sexual preference. As more specifically outlined in Paragraph.
5. Count VII is against all Defendants and is substantially similar to federal provision 42 U.S. **U.S.C. 3604(t)(2)(a)**.
6. Count X is against all Defendants and is substantially similar to federal provision 42 U.S. **U.S.C. 3604(t)(3)(b)**
7. All of these Counts Todd Hooper have allegations of joint and several liability and there are no Counts where Todd Hooper is being sued individually.

Dated this 3<sup>rd</sup> of September 2024

Respectfully Submitted,

Neil Bryan Tygar, P.A.  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 3<sup>rd</sup> day of September 2024, a true and correct copy of the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

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